

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

12 Cr. 423 (AJN)

-against-

DECLARATION

MINH QUANG PHAM,

Defendant.

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BOBBI C. STERNHEIM, ESQ., pursuant to 28 U.S.C. § 1746, hereby declares under penalty of perjury:

1. I am an attorney admitted to practice before this Court and counsel of record for defendant Minh Quang Pham ("Pham") in the above-captioned case.

2. I make this declaration in support of Pham's motion seeking Rule 15 depositions of witnesses or live testimony by CCTV from London, letters rogatory for one witness, and safe passage for witnesses able to travel to the United States.

3. The factual allegations in support of the motion are based on personal knowledge and upon information and belief and are recited in the accompanying Memorandum of Law.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, NY  
October 26, 2015

*Bobbi C. Sternheim*

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BOBBI C. STERNHEIM, ESQ.